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*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

AMY R. ROTH,

Adv. Pro. No. 10-05132 (SMB)

Defendant.

**STIPULATION AND ORDER**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and defendant Amy R. Roth represent as follows:

**WHEREAS**, on November 10, 2010, this Court entered the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “LPO”) [Adv. Pro. No. 08-01789 (SMB), Dkt. 3141];

**WHEREAS**, the Trustee commenced this action (the “Adversary Proceeding”) by filing a complaint (the “Complaint”) on December 2, 2010 [Dkt. 1];

**WHEREAS**, Defendant filed an answer to the Complaint on May 1, 2014 [Dkt. 28];

**WHEREAS**, pursuant to the Notice of Applicability filed by the Trustee in this Adversary Proceeding on December 2, 2010 [Dkt. 2], the LPO and the avoidance procedures contained therein (the “Avoidance Procedures”) are applicable to the instant matter;

**WHEREAS**, under the Avoidance Procedures, “the parties shall meet, either in person or by teleconference, and confer on a mediation, discovery and litigation plan (the ‘Initial Case Conference’)” within 30 days after an answer is filed (the “Initial Case Conference Period”);

**WHEREAS**, Defendant is not represented by counsel and currently is in the process of obtaining counsel to represent her in the Adversary Proceeding;

**WHEREAS**, the Trustee has agreed to allow Defendant approximately one month to obtain counsel to represent her in the Adversary Proceeding before proceeding with the Initial Case Conference; and

**WHEREAS**, the parties have agreed to extend the Initial Case Conference Period in this Adversary Proceeding, which would otherwise have ended on June 2, 2014;

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**NOW, THEREFORE**, the Parties stipulate and agree to, and the Court **ORDERS**, the following:

1. The Initial Case Conference Period is hereby extended to July 18, 2014.

Dated: July 1, 2014  
New York, New York

**BAKER & HOSTETLER LLP**

**AMY R. ROTH**

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By: /s/ Amy R. Roth

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Estate of Bernard L. Madoff*

SO ORDERED ON July 1<sup>st</sup>, 2014:

/s/ STUART M. BERNSTEIN  
HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE